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14 Proposed Attorneys for Debtor and Debtor-in-Possession  
15 MI PUEBLO SAN JOSE, INC.

16 UNITED STATES BANKRUPTCY COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN JOSE DIVISION

19 In re:

20 MI PUEBLO SAN JOSE, INC.,  
21 Debtor.

Case No. 13-53893-ASW

Chapter 11

NO HEARING REQUIRED

22 **EX PARTE APPLICATION FOR AN EXTENSION**  
23 **OF TIME TO FILE SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

24 TO: THE HONORABLE ARTHUR S. WEISSBRODT, UNITED STATES  
25 BANKRUPTCY JUDGE:

26 The Ex Parte Application of MI PUEBLO SAN JOSE, INC., Debtors-In-Possession  
27 herein ("Mi Pueblo"), respectfully represents:  
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2 1. On July 22, 2013, Mi Pueblo filed a voluntary Petition under Chapter 11 of Title  
3 11, United States Code. No trustee has been appointed in this case.

4 2. Mi Pueblo operates a chain of supermarkets serving the Hispanic community with  
5 twenty-one stores, over 3,200 employees, several hundred vendors and numerous executory  
6 contracts.

7 3. It was anticipated that Mi Pueblo would be able to come to an agreement with its  
8 secured lender and avoid a bankruptcy filing, but unfortunately that did not happen and Mi  
9 Pueblo has since been trying to deal with a last minute Chapter 11 filing, becoming educated as  
10 to all of the Chapter 11 rules and guidelines, working with its secured lender to pay critical  
11 vendors/suppliers with PACA/PSA or other 503(b)(9) claims and employees and address a  
12 number of other critical and important items to assure that Mi Pueblo may continue to effectively  
13 operate its business with as little disruption to the business as possible. In addition, Mi Pueblo  
14 has been assisting its counsel in drafting and finalizing a budget and getting counsel the  
15 necessary information to complete all other necessary pleadings necessary for first day motions,  
16 employment of professionals and for its schedules.

17 4. Due to the size of Mi Pueblo's operations and numerous locations, there are large  
18 amounts of contracts, employee information, vendor and supplier invoices and items in transit at  
19 time of the filing, etc. that must be compiled, compared, provided to counsel and reviewed in  
20 order to complete its schedules.

21 5. As a result of the above, Mi Pueblo needs further time to compose and retrieve all  
22 of the necessary information to prepare the schedules and statement of financial affairs.  
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2 6. Mi Pueblo believes it will be in a position to file the schedules and statement of  
3 affairs by August 19, 2013 and, therefore, requests an extension of time for approximately two  
4 weeks until August 19, 2013 to do so.

5 7. Mi Pueblo's Meeting of Creditors is scheduled for August 28, 2013 and the Initial  
6 Debtor Interview is currently scheduled for August 22, 2013. Mi Pueblo does not believe the  
7 proposed extension would impact the scheduled meetings and will do its best to get on file what  
8 it can in advance of the proposed extension.

9 WHEREFORE, Mi Pueblo respectfully requests an extension of time to complete  
10 the preparation and filing of the schedules and statement of affairs until August 19, 2013 and  
11 such other and further relief as the Court believes just and proper.  
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13 Dated: July 29, 2013

BINDER & MALTER, LLP

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15 By: /s/ Roya Shakoori  
16 Roya Shakoori

17 Attorneys for Debtor and Debtor-in-possession  
18 MI PUEBLO SAN JOSE, INC.  
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